



U.S. Department of Energy
Office of River Protection

P.O. Box 450
Richland, Washington 99352

01-OSR-0028

Ms. M. P. DeLozier, President
and General Manager
CH2M HILL Hanford Group, Inc.
Richland, Washington 99352

Dear Ms. DeLozier:

**CONTRACT NO. DE-AC27-99RL14047 - OFFICE OF SAFETY REGULATION (OSR) PARTIAL
APPROVAL OF AUTHORIZATION BASIS CHANGE NOTICE ABCN-W375-00-00049**

- Reference:
1. Letter, J. O. Honeyman, CHG, to W. J. Taylor, "Submission of the Revised Radiation Protection Program and Request for Closure of Authorization Basis Amendment Request ABAR-W375-00-00011 Through Submission of Authorization Basis Change Notice ABCN-W375-00-00049," 01-RU-0032, dated November 28, 2000.
 2. Letter, A. J. Dobson, BNFL, to D. C. Gibbs, RL, "...Authorization Basis Amendment Request, ABAR-W375-00-00011, Revision 0, 'Unrestricted Area Dose Rates,' Affecting the Safety Requirements Document and the Integrated Safety Management Plan," 00-RU-0449, dated June 13, 2000
 3. Letter, D. Clark Gibbs, OSR, to P. O. Strawbridge, BNFL Inc., "Regulatory Unit (RU) Disapproval of ABAR-W375-00-00011, Unrestricted Area Dose Rates," 00-RU-0507, dated July 28, 2000.

By letter dated November 28, 2000, CHG submitted ABCN-W375-00-00049 for OSR approval (Reference 1). The ABCN consists of two distinct issues. The more significant portion of the ABCN includes a proposed revision to the Radiation Protection Plan (RPP). The review of this portion of the ABCN is still in progress. This letter is a response to the second issue included in the ABCN. The second issue consists of a re-submittal of proposed changes to the Safety Requirements Document (SRD) and the Integrated Safety Management Plan (ISMP) that were initially proposed by ABAR-W375-00-00011 and disapproved by the Office of Safety Regulation (OSR).

ABAR-W375-00-00011 was submitted by BNFL Inc. (BNFL) for approval on June 13, 2000. The proposed ABAR was disapproved by a letter from OSR dated July 28, 2000 (Reference 3). The Safety Evaluation that was included with the disapproval letter concluded that all safety

issues related to the proposed changes were adequately addressed by the BNFL submittal. However, the BNFL submittal included references to a superceded DOE implementation guide, G-10 CFR 835/B2, "Occupational ALARA Program," which, in turn, referenced an outdated version of 10 CFR 835. Although issues germane to the Safety Evaluation were not affected by the reference to outdated documents, the BNFL submittal was disapproved since it referenced this superceded standard that is inconsistent with the current 10 CFR 835. ABCN-W375-00-00049 included corrected references to the appropriate 10 CFR 835 implementing guides. Based on this correction and the Safety Evaluation included in Reference 2, OSR approves the changes proposed to the SRD and ISMP by ABCN-W375-00-0049. The SRD and ISMP approved changes are as follows:

- (1) The use of DOE G 441.1-2, "Occupational ALARA Program Guide," as the implementing standard for SRD Safety Criterion 2.0-3 rather than use of ISMP Sections 2.3 and 3.9.1.2 as implementing standards.
- (2) Change of Section 3.9.1.2 of the ISMP to note that ALARA features will be shown on facility layout drawings rather than on radiation protection drawings.

Additionally, changes to the correct references of the 10 CFR 835 implementing guides as identified in ABCN-W375-00-00049 affected the following SRD sections: SC 2.0-3, 5.0-1, 5.1-4, 5.1-6, 5.3-2, 8.0-2 and Appendix F, Section 1.0.

As part of the change implementation process, please submit within 14 days of receipt of this letter the revised pages of the ISMP and the SRD. In addition please provide a revision page for the SRD and the ISMP identifying all SRD and ISMP revisions to date. This amendment is effective immediately and shall be fully implemented within 30 days i.e., the provisions of the change may be used immediately; within 30 days, controlled copies of the ISMP, SRD, and subordinate documents should be modified to reflect the changes associated with this amendment.

Nothing in this letter should be construed as changing the Contract No. DE-AC27-99RL14047. If you have any questions, please contact Mr. George Kalman, OSR, on (509) 372-0652.

Sincerely,

William J. Taylor
Acting Assistant Manager
for Project Delivery

OSR:JLP